

<b>UNITED STATES BANKRUPTCY COURT</b> <b>DISTRICT OF NEW JERSEY</b> <b>Caption in Compliance with D.N.J. LBR 9004-1(b)</b>	
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<p>In re:</p> <p><b>BLOCKFI INC., et al.,</b></p> <p style="text-align: right;">Debtors.<sup>1</sup></p>	<p>Chapter 11</p> <p>Case No. 22-19361 (MBK)</p> <p>Jointly Administered</p>

<sup>1</sup> The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC. (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors' service address is 100 Horizon Center Blvd., 1<sup>st</sup> and 2<sup>nd</sup> Floors, Hamilton, NJ 08691.

**NOTICE OF MOTION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO FILE UNREDACTED COPIES OF THE COMMITTEE'S PRELIMINARY REPORT AND PLAN STATEMENT AND OBJECTION TO THE MOTION TO SEAL THE REPORT**

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**PLEASE TAKE NOTICE** that the Official Committee of Unsecured Creditors (the “**Committee**”) in the above-captioned case of BlockFi, Inc. and its affiliated debtors (collectively, the “**Debtors**” or “**BlockFi**”), by and through the Committee’s counsel, shall move (the “**Motion**”), accompanied by an application requesting to be heard on an expedited basis (the “**Scheduling Application**”), before the Honorable Michael B. Kaplan, Chief United States Bankruptcy Judge for the United States Bankruptcy Court for the District of New Jersey, Trenton Vicinage, at the Clarkson S. Fisher U.S. Courthouse, located at 402 East State Street, Trenton, New Jersey 08608, in Courtroom No. 8, entry of an order, substantially in the form submitted with the Motion, authorizing the Committee to file unredacted copies of (i) the Committee’s *Preliminary Report Addressing Question Posed by the Official Committee of Unsecured Creditors: Why Did BlockFi Fail?* (the “**Preliminary Report**”) by denying the *Application in Support of the Motion of the Official Committee of Unsecured Creditors for (I) Authority to File Under Seal the Preliminary Report of the Official Committee of Unsecured Creditors and (II) Other related Relief* (the “**Motion to Seal the Preliminary Report**”) [Docket No. 928]; and (ii) the *Statement of the Official Committee of Unsecured Creditors Respecting the Debtors’ Amended Joint Chapter 11 Plan* (the “**Committee’s Plan Statement**”) [Docket No. 899]..

**PLEASE TAKE FURTHER NOTICE** that, substantially contemporaneously with the filing of the Motion, the Committee also filed a Scheduling Application requesting that the hearing on the Motion be scheduled for July 13, 2023 at 10:00 a.m. **PLEASE TAKE NOTE that the**

**order entered with respect to the Scheduling Application will, among other things, specify the date and time of the hearing on the Motion.**

**PLEASE TAKE FURTHER NOTICE** that, the Committee shall rely upon the *Motion of the Official Committee of Unsecured Creditors to File Unredacted Copies of the Committee's Preliminary Report and Plan Statement and Objection to the Motion to Seal the Report* filed herewith in support of the relief sought by this Motion, and that no brief is being filed herewith since the legal basis upon which relief should be granted is set forth in the supporting application.

**PLEASE TAKE FURTHER NOTICE** that, oral argument is requested, unless the Court directs that no oral argument would be necessary.

**PLEASE TAKE FURTHER NOTICE**, that all objections, if any, must be made accordance with the Court's order entered with respect to the Scheduling Application. If the order entered with respect to the Scheduling Application directs that written objections be filed, then in accordance with D.N.J. LBR 9013-2(a)(2), written objections shall be filed with the Clerk of the United States Bankruptcy Court, for the District of New Jersey, Courthouse, 402 East State Street, Trenton, New Jersey 08608, and a copy thereof must simultaneously be served upon GENOVA BURNS, LLC., Attn: Daniel M. Stolz, Esq., 110 Allen Road, Suite 304, Basking Ridge, New Jersey 07920, so they are received by the deadline set forth in the Court's order entered with respect to the Scheduling Application.

**PLEASE TAKE FURTHER NOTICE** that in the absence of any objections, the relief requested hereunder may be granted without further notice.

Dated: June 28, 2023

**GENOVA BURNS LLC**

By: /s/ Gregory S. Kinoian

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